

Exhibit A

**IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA**

SHIRLEY P. CORBIN,

Plaintiff,

v.

FAMILY DOLLAR STORES OF
GEORGIA, INC., DOLLAR TREE
STORES, INC., MBC GRINGS HILL LP,
XYZ CO., ABC CO.,

Defendants.

CIVIL ACTION
FILE NO:**21-C-04830-S2****COMPLAINT**

COMES NOW, SHIRLEY P. CORBIN (Plaintiff), by and through the undersigned counsel and hereby files this Complaint against FAMILY DOLLAR STORES OF GEORGIA, INC. ("Defendant Family Dollar"), DOLLAR TREE STORES, INC. ("Defendant Dollar Tree"), MBC GRINGS HILL LP ("Defendant MBC"), and shows this Honorable Court as following:

INTRODUCTION

The preceding paragraphs and allegations are hereby incorporated herein by reference as if fully set forth herein.

1.

Served with this Complaint are Plaintiff's Interrogatories to Defendants, Plaintiff's Request of Production to Defendants, and Plaintiff's Request for Admission to Defendants.

PARTIES, JURISDICTION AND VENUE

The preceding paragraphs and allegations are hereby incorporated herein by reference as if fully set forth herein.

2.

Plaintiff is an individual and resident of DeKalb County, Georgia and submits to the jurisdiction and venue of this Court.

3.

Jurisdiction is proper as to Defendant Family Dollar because Defendant is registered to do business in the state of Georgia.

4.

Venue is proper as to Defendant Family Dollar because its registered agent is located within Gwinnett County, Georgia. Defendant Family Dollar is a foreign corporation existing under the laws of Virginia with its principal place of business in Virginia, and may be served with a copy of this Complaint and Summons through its registered agent, Corporation Service Company, at 2 Sun Court, Suite 400, Peachtree Corners, GA, 30092.

5.

Jurisdiction is proper as to Defendant Dollar Tree because Defendant is registered to do business in the state of Georgia.

6.

Venue is proper as to Defendant Dollar Tree because its registered agent is located within Gwinnett County, Georgia. Defendant Dollar Tree is a foreign corporation existing under the laws of Virginia with its principal place of business in Virginia, and may be served with a copy of this Complaint and Summons through its registered agent, Corporation Service Company, at 2 Sun Court, Suite 400, Peachtree Corners, GA, 30092.

7.

Jurisdiction is proper as to Defendant MBC because Defendant is registered to do

business in the state of Georgia.

8.

Venue is proper as to Defendant MBC because it is proper as to Defendant Family Dollar. Defendant MBC is a foreign corporation existing under the laws of Pennsylvania with its principal place of business in Pennsylvania, and may be served with a copy of this Complaint and Summons through its registered agent, National Registered Agents, Inc., at 289 S. Culver Street, Lawrenceville, GA, 30046.

FACTS APPLICABLE TO ALL CLAIMS

Plaintiff hereby incorporates by reference the allegations contained in this Complaint for Damages and reassert said allegations as if fully set forth herein.

9.

On or about July 14, 2019, the date of her injuries, Plaintiff was an invitee of Defendant MBC in accordance with the provisions of O.C.G.A. § 51-3-1, et seq., while shopping at the Family Dollar located at 2500 Snapfinger Road, Decatur, Georgia 30034, store #8474-08474 (hereinafter “the premises”), which is operated by Defendant Dollar Tree and Defendant Family Dollar.

10.

Plaintiff, while a lawful invitee on the premises, was walking with her shopping cart inside the premises when the cart ran over unattended bags of candy on the floor, causing the cart to flip over and knock her to the ground, causing Plaintiff to sustain significant bodily injuries, requiring extensive and subsequent medical treatment.

COUNT I – NEGLIGENCE AS TO DEFENDANT FAMILY DOLLAR

Plaintiff hereby incorporates by reference the allegations contained in this Complaint for Damages and reassert said allegations as if fully set forth herein.

11.

The Defendant failed to meet common law and statutory duties pursuant to O.C.G.A. §§ 51-3-1 and 51-3-2, et al., to exercise ordinary care in keeping the premises and approaches safe and to protect Plaintiff from unreasonable risks of foreseeable harm.

12.

The Defendant was negligent in failing to keep the premises safe and in repair, as required by law. As the direct and proximate result of Defendant's negligence in failing to keep the premises safe, Plaintiff tripped over unattended bags of candy on the floor, causing her to sustain injuries, including bodily injury, pain and suffering.

13.

As a direct and proximate result of Defendant's negligence, Plaintiff incurred medical expenses, in an amount to be proven at trial, for the treatment of the injuries Plaintiff sustained that were caused solely and proximately by Defendant's negligence.

14.

As a direct and proximate result of the Defendant's negligence, Plaintiff will incur future medical expenses, in an amount to be proven at trial, for the treatment of the injuries caused solely by the negligence of the Defendant's.

15.

As a direct and proximate result of the Defendant's negligence, Plaintiff incurred lost wages in an amount to be proven at trial.

16.

Plaintiff is entitled to recover of Defendant such reasonable sums as compensatory, general and special damages as may be shown by the evidence.

17.

The Defendant had actual or constructive knowledge of the condition or conditions on the premises which led to the Plaintiff's injuries.

18.

Plaintiff was without fault in causing the aforementioned incident.

COUNT I – NEGLIGENCE AS TO DEFENDANT DOLLAR TREE

Plaintiff hereby incorporates by reference the allegations contained in this Complaint for Damages and reassert said allegations as if fully set forth herein.

19.

The Defendant failed to meet common law and statutory duties pursuant to O.C.G.A. §§ 51-3-1 and 51-3-2, et al., to exercise ordinary care in keeping the premises and approaches safe and to protect Plaintiff from unreasonable risks of foreseeable harm.

20.

The Defendant was negligent in failing to keep the premises safe and in repair, as required by law. As the direct and proximate result of Defendant's negligence in failing to keep the premises safe, Plaintiff tripped over unattended bags of candy on the floor, causing her to sustain injuries, including bodily injury, pain and suffering.

21.

As a direct and proximate result of Defendant's negligence, Plaintiff incurred medical expenses, in an amount to be proven at trial, for the treatment of the injuries Plaintiff sustained that were caused solely and proximately by Defendant's negligence.

22.

As a direct and proximate result of the Defendant's negligence, Plaintiff will incur future

medical expenses, in an amount to be proven at trial, for the treatment of the injuries caused solely by the negligence of the Defendant's.

23.

As a direct and proximate result of the Defendant's negligence, Plaintiff incurred lost wages in an amount to be proven at trial.

24.

Plaintiff is entitled to recover of Defendant such reasonable sums as compensatory, general and special damages as may be shown by the evidence.

25.

The Defendant had actual or constructive knowledge of the condition or conditions on the premises which led to the Plaintiff's injuries.

26.

Plaintiff was without fault in causing the aforementioned incident.

COUNT I – NEGLIGENCE AS TO DEFENDANT MBC

Plaintiff hereby incorporates by reference the allegations contained in this Complaint for Damages and reassert said allegations as if fully set forth herein.

27.

The Defendant failed to meet common law and statutory duties pursuant to O.C.G.A. §§ 51-3-1 and 51-3-2, et al., to exercise ordinary care in keeping the premises and approaches safe and to protect Plaintiff from unreasonable risks of foreseeable harm.

28.

The Defendant was negligent in failing to keep the premises safe and in repair, as required by law. As the direct and proximate result of Defendant's negligence in failing to keep the premises

safe, Plaintiff tripped over unattended bags of candy on the floor, causing her to sustain injuries, including bodily injury, pain and suffering.

29.

As a direct and proximate result of Defendant's negligence, Plaintiff incurred medical expenses, in an amount to be proven at trial, for the treatment of the injuries Plaintiff sustained that were caused solely and proximately by Defendant's negligence.

30.

As a direct and proximate result of the Defendant's negligence, Plaintiff will incur future medical expenses, in an amount to be proven at trial, for the treatment of the injuries caused solely by the negligence of the Defendant's.

31.

As a direct and proximate result of the Defendant's negligence, Plaintiff incurred lost wages in an amount to be proven at trial.

32.

Plaintiff is entitled to recover of Defendant such reasonable sums as compensatory, general and special damages as may be shown by the evidence.

33.

The Defendant had actual or constructive knowledge of the condition or conditions on the premises which led to the Plaintiff's injuries.

34.

Plaintiff was without fault in causing the aforementioned incident.

WHEREFORE, the Plaintiff prays:

1. That Defendant be served with summons, process and a copy of this Complaint as provided by law;
2. That Plaintiff obtain judgment against the Defendant for general and special damages as determined at trial as well as costs of litigation and expenses;
3. That the Plaintiff be granted a trial by jury as to all triable issues in this cause; and
4. For such other and further relief as this Court deems just and equitable under all circumstances alleged and contained herein.

This 1st day of July, 2021.

HAUG LAW GROUP, LLC

/s/ William J. Collins

William J. Collins

Georgia Bar No.: 161672

Attorney for Plaintiff

8237 Dunwoody Place
Atlanta, Georgia 30350
Phone: 1-844-428-4528
Fax: 678-528-2999
Email: William@HaugLawGroup.com

General Civil and Domestic Relations Case Filing Information Form

☐ Superior or ☒ State Court of GWINNETT County

For Clerk Use Only

Date Filed _____
MM-DD-YYYYCase Number 21-C-04830-S2

Plaintiff(s)

CORBIN, SHIRLEY P.

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Defendant(s)

FAMILY DOLLAR STORES OF GEORGIA, INC.

Last First Middle I. Suffix Prefix

DOLLAR STORES INC.

Last First Middle I. Suffix Prefix

MBC Grings Hill, LP

Last First Middle I. Suffix Prefix

ABC CO.

Last First Middle I. Suffix Prefix

Plaintiff's Attorney WILLIAM J. COLLINS State Bar Number 161672 Self-Represented ☐

Check one case type and one sub-type in the same box (if a sub-type applies):

General Civil Cases

- ☐ Automobile Tort
- ☐ Civil Appeal
- ☐ Contempt/Modification/Other Post-Judgment
- ☐ Contract
- ☐ Garnishment
- ☒ General Tort
- ☐ Habeas Corpus
- ☐ Injunction/Mandamus/Other Writ
- ☐ Landlord/Tenant
- ☐ Medical Malpractice Tort
- ☐ Product Liability Tort
- ☐ Real Property
- ☐ Restraining Petition
- ☐ Other General Civil

Domestic Relations Cases

- ☐ Adoption
- ☐ Contempt
- ☐ Non-payment of child support, medical support, or alimony
- ☐ Dissolution/Divorce/Separate Maintenance/Alimony
- ☐ Family Violence Petition
- ☐ Modification
- ☐ Custody/Parenting Time/Visitation
- ☐ Paternity/Legitimation
- ☐ Support – IV-D
- ☐ Support – Private (non-IV-D)
- ☐ Other Domestic Relations

- ☐ Check if the action is related to another action pending or previously pending in this court involving some or all of the same: parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number _____

Case Number _____

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in OCGA § 9-11-7.1.

- ☐ Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

_____ Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

SHIRLEY P. CORBIN

CIVIL ACTION

NUMBER: _____

PLAINTIFF

VS.

FAMILY DOLLAR STORES OF GEORGIA, INC.,

DOLLAR STORES INC.,

MBC GRINGS HILL, LP., XYZ CO., ABC CO.

DEFENDANT

SUMMONS

TO THE ABOVE NAMED DEFENDANT: FAMILY DOLLAR STORES OF GEORGIA, INC.

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

William J. Collins
Haug Law Group
8237 Dunwoody Place,
Building 18
Atlanta, GA 30350

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This _____ day of _____, 20____.

**Richard T. Alexander, Jr.,
Clerk of State Court**

By _____
Deputy Clerk

INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum sheet is used.

SC-1 Rev. 2011

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

SHIRLEY P. CORBIN

CIVIL ACTION **21-C-04830-S2**
NUMBER: _____

PLAINTIFF

VS.

FAMILY DOLLAR STORES OF GEORGIA, INC.,

DOLLAR STORES INC.,

MBC GRINGS HILL, LP., XYZ CO., ABC CO.

DEFENDANT

SUMMONS

TO THE ABOVE NAMED DEFENDANT: MBC Grings Hill, LP

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

William J. Collins
Haug Law Group
8237 Dunwoody Place,
Building 18
Atlanta, GA 30350

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This **2ND** day of **JULY**, 20**21**.

TIANA P. GARNER

~~Richard T. Alexander, Jr.,~~
Clerk of State Court

By  _____
Deputy Clerk

INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum sheet is used.

SC-1 Rev. 2011

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

SHIRLEY P. CORBIN

CIVIL ACTION

NUMBER: _____

PLAINTIFF

VS.

FAMILY DOLLAR STORES OF GEORGIA, INC.,

DOLLAR STORES INC.,

MBC GRINGS HILL, LP., XYZ CO., ABC CO.

DEFENDANT

SUMMONS

TO THE ABOVE NAMED DEFENDANT: DOLLAR STORES INC.

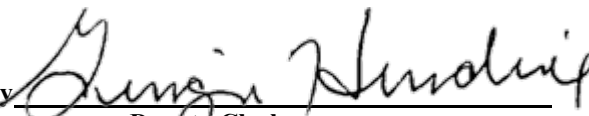
You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

William J. Collins
Haug Law Group
8237 Dunwoody Place,
Building 18
Atlanta, GA 30350

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 6 day of JULY, 2021.

~~Richard T. Alexander, Jr.,~~
Clerk of State Court TIANA P. GARNER

By 
Deputy Clerk

INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum sheet is used.

SC-1 Rev. 2011

AFFIDAVIT OF SERVICE

State of Georgia

County of Gwinnett

State Court

Case Number: 21-C-04830-S2

Plaintiff:

Shirley P Corbin

vs.

Defendant:

Family Dollar Stores of Georgia Inc, Dollar Stores Inc, MBC Spring Hill, LP, ABC Co.

For:

William Collins
Haug Law Group
8237 Dunwoody Place
Building 18
Atlanta, GA 30350Received by Perma Investigations on the 7th day of July, 2021 at 8:34 am to be served on **MBC Grings Hill LP c/o National Registered Agents, 289 S Culver Street, Lawrenceville, GA 30046.**I, Marc Perlson, being duly sworn, depose and say that on the **9th day of July, 2021 at 10:00 am, I:**served **MBC Grings Hill LP c/o National Registered Agents** by delivering a true copy of the **General Civil Case Filing Information Form and Summons and Complaint, and Plaintiff's First Continuing Interrogatories, Request for Production , and Request for Admissions to Defendant Dollar Tree to:** National Registered Agents as **Registered Agent, BY LEAVING THE SAME WITH** Linda Banks as **Authorized to Accept** at the address of: **289 S Culver Street, Lawrenceville, GA 30046.**

I am an agent of Perma Investigations and am competent in all respects to testify regarding the matters set forth herein. I have personal knowledge of the facts stated herein and know them to be true. I have no interest in the outcome of this action and am not related to any of the parties. I am 18 or more years of age and I have been appointed by this Court to serve process.

**Marc Perlson**
PermaSubscribed and Sworn to before me on the 9th
day of July, 2021 by the affiant
who is personally known to me.
NOTARY PUBLIC**Perma Investigations**
2020 Hembree Grove Drive
Roswell, GA 30076
(770) 664-8005

Our Job Serial Number: ANC-2021007554



AFFIDAVIT OF SERVICE

State of Georgia

County of Gwinnett

State Court

Case Number: 21-C-04830-S2

Plaintiff: **Shirley P Corbin**

vs.

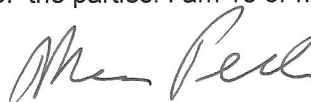
Defendant: **Family Dollar Stores of Georgia Inc, Dollar Stores Inc, MBC
Spring Hill, LP, ABC Co.**

For:

William Collins
Haug Law Group
8237 Dunwoody Place
Building 18
Atlanta, GA 30350Received by Perma Investigations on the 7th day of July, 2021 at 8:34 am to be served on **Family Dollar Stores of Georgia Inc c/o Corporation Service Company, 2 Sun Court, Suite 400, Peachtree Corners, GA 30092.**I, Marc Perlson, being duly sworn, depose and say that on the **9th day of July, 2021 at 9:30 am, I:**served **Family Dollar Stores of Georgia Inc c/o Corporation Service Company** by delivering a true copy of the **General Civil Case Filing Information Form and Summons and Complaint, and Plaintiff's First Continuing Interrogatories, Request for Production , and Request for Admissions to Defendant Family Dollar to: Corporation Service Company as Registered Agent, BY LEAVING THE SAME WITH Alisha Smith as Authorized to Accept** at the address of: **2 Sun Court, Suite 400, Peachtree Corners, GA 30092.****Additional Information pertaining to this Service:**

7/9/2021 9:30 am corporate service made at 2 Sun Court Suite 400, Peachtree Corners, GA 30092, by serving Alisha Smith, CSC Coordinator. Black female, black hair, 35-40 years old, ~5'8", ~150 lbs, no glasses.

I am an agent of Perma Investigations and am competent in all respects to testify regarding the matters set forth herein. I have personal knowledge of the facts stated herein and know them to be true. I have no interest in the outcome of this action and am not related to any of the parties. I am 18 or more years of age and I have been appointed by this Court to serve process.

**Marc Perlson**
Perma**Perma Investigations**
2020 Hembree Grove Drive
Roswell, GA 30076
(770) 664-8005

Our Job Serial Number: ANC-2021007556

Subscribed and Sworn to before me on the 9th
day of July, 2021 by the affiant
who is personally known to me.

NOTARY PUBLIC



AFFIDAVIT OF SERVICE

State of Georgia

County of Gwinnett

State Court

Case Number: 21-C-04830-S2

Plaintiff: **Shirley P Corbin**

vs.

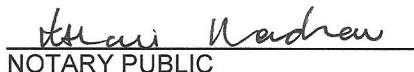
Defendant: **Family Dollar Stores of Georgia Inc, Dollar Stores Inc, MBC
Spring Hill, LP, ABC Co.**

For:

William Collins
Haug Law Group
8237 Dunwoody Place
Building 18
Atlanta, GA 30350Received by Perma Investigations on the 7th day of July, 2021 at 8:34 am to be served on **Dollar Stores Inc c/o Corporation Service Company, 2 Sun Court, Suite 400, Peachtree Corners, GA 30092.**I, Marc Perlson, being duly sworn, depose and say that on the **9th day of July, 2021 at 9:30 am, I:****served Dollar Stores Inc c/o Corporation Service Company by delivering a true copy of the General Civil Case Filing Information Form and Summons and Complaint, and Plaintiff's First Continuing Interrogatories, Request for Production, and Request for Admissions to Defendant Dollar Tree to: Corporation Service Company as Registered Agent, BY LEAVING THE SAME WITH Alisha Smith as Authorized to Accept at the address of: 2 Sun Court, Suite 400, Peachtree Corners, GA 30092.****Additional Information pertaining to this Service:**

7/9/2021 9:30 am corporate service made at 2 Sun Court Suite 400, Peachtree Corners, GA 30092, by serving Alisha Smith, CSC Coordinator. Black female, black hair, 35-40 years old, ~5'8", ~150 lbs, no glasses.

I am an agent of Perma Investigations and am competent in all respects to testify regarding the matters set forth herein. I have personal knowledge of the facts stated herein and know them to be true. I have no interest in the outcome of this action and am not related to any of the parties. I am 18 or more years of age and I have been appointed by this Court to serve process.

**Marc Perlson**
PermaSubscribed and Sworn to before me on the 9th
day of July, 2021 by the affiant
who is personally known to me.
NOTARY PUBLIC**Perma Investigations**
2020 Hembree Grove Drive
Roswell, GA 30076
(770) 664-8005

Our Job Serial Number: ANC-2021007555

